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THOMAS D. SANGREY and AIMEE I. SANGREY, his wife

IN THE

Complainants and Cross Defendents CIRCUIT COURT FOR

Cross Defendents

FREDERICK COUNTY

VS.

MARYLAND

HOWELL C. HAPP, JR., and SHIRLEY L. HAPP, his wife

EQUITY NO. 26,050

Defendants and Cross-Complainants

CROSS BILL OF COMPLAINT TO QUIET TITLE

Now comes Howell C. Happ, Jr., and Shirley L. Happ, his wife by their attorney, Herbert D. Morrison, and cross complains as follows:

- 1. Cross-Complainants are the fee simple owners of a tract of land in the Braddock District, Frederick County, Maryland, by virtue of a deed from John A. Erlewine and wife dated May 2, 1972 (copy attached to original Complaint as Exhibit "G");
- 2. That Cross-Defendants claim title to a small portion of said real property by virtue of deeds and facts set forth and alleged in their Bill of Complaint filed herein;
- 3. That fee simple title is truely and justly vested in your Cross-Complainants by virtue of the continuous open, adverse, hostile and exclusive possession of said property by Cross- Complainants and their predecessors in title for an unbroken period of more than twenty (20) years (1941 to the present time);
- 4. That the claims of Cross-Defendants constitute a cloud on the title of your Cross-Complainants and said Cross-Complainants desire to have said cloud upon their title removed so that they may have a marketable fee simple title thereto;
 - 5. That Cross-Defendants' claims to title have delayed the use or sale of the property in question by Cross-Complaintiffs to their substantial financial loss and damages;

BERT D. MORRISON, P.A., A